

**DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT
FOR
REDUCING WILDLIFE DAMAGE AT MISSOURI AIRPORTS
THROUGH AN INTEGRATED WILDLIFE DAMAGE MANAGEMENT PROGRAM**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (USDA-APHIS), Wildlife Services (WS) program responds to requests for assistance from individuals, organizations and agencies experiencing damage caused by wildlife. Ordinarily, according to APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management actions may be categorically excluded (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). To evaluate and determine if any potentially significant impacts to the human environment from WS planned and proposed program would occur, an environmental assessment (EA) was prepared. The EA documents the need for wildlife damage management for Missouri Airports and assessed potential impacts of various alternatives for responding to damage problems. WS proposed action is to continue an Integrated Wildlife Damage Management (IWDM) program for airports in Missouri. No comments were received from the public involvement process.

The EA analyzes the potential environmental and social effects for resolving wildlife damage related to the protection of aircraft, human health and safety and the airport environment. Missouri has an area of 44,124,883 acres; and as of July 19, 2001, WS has agreements with five Missouri airports. The total land area in question represents less than 0.0004% of all Missouri land. (Management Information System (MIS 2001)

WS is the Federal program authorized by law to reduce damage caused by wildlife (Animal Damage Control Act of March 2, 1931, as amended (46 Stat. 1486; 7 U.S.C. 426-426c) and the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988, Public Law 100-102, Dec. 27, 1987. Stat. 1329-1331 (7 U.S.C. 426c). Wildlife damage management is the alleviation of damage or other problems caused by or related to the presence of wildlife, and is recognized as an integral part of wildlife management (The Wildlife Society 1992). WS uses an Integrated Wildlife Damage Management (IWDM) approach, commonly known as Integrated Pest Management (WS Directive 2.105) in which a combination of methods may be used or recommended to reduce damage. WS wildlife damage management is not based on punishing offending animals but as one means of reducing damage and is used as part of the WS Decision Model (Slate et al. 1992, USDA 1997, WS Directive 2.201). The imminent threat of damage or loss of resources is often deemed sufficient for wildlife damage management actions to be initiated (U.S. District Court of Utah 1993). Missouri airport officials have requested WS to conduct wildlife damage management to protect aircraft, human health and safety and the airport environment. All Missouri WS wildlife damage management is in compliance with relevant laws, regulations, policies, orders and procedures, including the Endangered Species Act of 1973 and Clean Water Act.

Missouri WS works and consults with four state agencies to reduce wildlife damage. The Missouri Department of Conservation (MDC) has the responsibility to manage all wildlife in Missouri, including federally listed Threatened and Endangered (T&E) species and migratory birds, which is a joint responsibility with the US Fish and Wildlife Service (USFWS). Memoranda of Understanding (MOU) signed between APHIS-WS and area state agencies clearly outline the responsibilities, technical expertise and coordination between agencies. A Multi-agency Team with representatives and consultants from each of the aforementioned agencies work with WS to assess the impacts of damage management in Missouri.

Consistency

Wildlife damage management conducted in Missouri will be consistent with MOU and policies of APHIS-WS, state agencies and the EA. The agencies may, at times, restrict damage management that concerns public safety or resource values.

The analyses in the EA demonstrate that Alternative 1: 1) best addresses the issues identified in the EA, 2) provides safeguards for public health and safety, 3) provides WS the best opportunity to reduce damage while providing low impacts on non-target species, 4) balances the economic effects to aircraft, vehicles, human health and safety and the airport environment, and 5) allows WS to meet its obligations to the MDC and other agencies or entities.

Monitoring

The Missouri WS program will annually provide the MDC and the USFWS the WS take of target and non-target animals to help ensure the total statewide take (WS and other take) does not impact the viability of wildlife populations as determined by the MDC and the USFWS. In addition, the EA will be reviewed each year to ensure that it and the analysis are sufficient. The number of species lethally removed annually from Missouri airports will not exceed the optimum number established and managed for by MDC and the USFWS on airport properties.

Public Involvement

Issues related to the proposed action were jointly developed by the Missouri WS office, the Operations Division at the several Missouri airports, along with input by the MDC. WS released a pre-decisional EA on May 29, 2001 and a Notice of the proposed action and invitation for public involvement was placed in the Kansas City Star with circulation throughout Missouri. Letter of the availability of the EA notified five interest groups. The 33-day public comment period on the pre-decisional EA ended on June 30, 2001. No letters of comment were received from the public during the comment period.

Major Issues

The EA describes the alternatives considered and evaluated using the identified issues. The following issues were identified as important to the scope of the analysis (40 CFR 1508.25).

- Effects on target wildlife species populations
- Effects on other wildlife species populations, including T&E species
- Effects of damage to property from wildlife strikes
- Effects on human health and safety
- Effects on aesthetics
- Humaneness and animal welfare concerns of lethal methods used by WS

Affected Environment

The areas of the proposed action include all Missouri airports. Missouri is located in the mid west with two major cities on the eastern and western borders. The state is made up of several ecological regions that include but are not limited to the Mississippi River Valley, the Ozarks, rolling hills and prairies. These ecosystems are home to a wide variety of wildlife and habitat. The state is also home to many airports and airfields; which include federal, state, county, city and private operated airfields. These airports and airfields occupy land, which include grassland, timber, runways, taxiways, recreational areas, office buildings and water impoundments.

Alternatives That Were Fully Evaluated

The following Alternatives were developed by the Missouri WS office to respond to the issues. Additional alternatives were considered but not analyzed in detail. A detailed discussion of the effects of the Alternatives on the issues is described in the EA; below is a summary of the Alternatives.

Alternative 1 - Fully Integrated Wildlife Damage Management (IWDM) (Proposed Action)

The proposed action is to continue a wildlife management program at Missouri airports through lethal and non-lethal methods. An Integrated Wildlife Damage Management (IWDM) approach would continue which would allow use of any legal technique or method, used singly or in combination, to meet requests or needs for resolving conflicts with wildlife affecting the use of the airport. Airport operations personnel requesting assistance would be provided with information regarding the use of effective non-lethal and lethal techniques. Lethal methods used by WS would include sharp shooting, pesticides and trapping. Non-lethal methods used or recommended by WS may include habitat alteration, fencing, deterrents, harassment and scaring devices. The implementation of non-lethal methods such as habitat alteration and exclusion-type barriers would be the responsibility of the airport to implement. WDM by WS would be allowed on Missouri airfields, when requested, where a need has been documented and upon completion of an Agreement for Control. All management actions would comply with appropriate federal, state, and local laws.

This alternative would allow for technical assistance, non-lethal and lethal wildlife damage management based on the needs of multiple resources (aircraft, human health and safety and the airport environment) and would be implemented following consultations with state agencies. This alternative would allow for the Missouri WS program to protect multiple resources on all Missouri airfields at the request of the airfield management. Alternative 1 conforms to the MOUs between WS, and state agencies that recognize WS as the primary agency for the management of wildlife at Missouri airports. Analysis of Alternative 1 showed low level of impact for the target species, non-target species and T&E species.

Alternative 2 - Non-lethal WDM Only By WS

This alternative would require WS to use and recommend non-lethal methods only to resolve all wildlife damage problems. Requests for information regarding lethal management approaches would be referred to MDC, local animal control agencies, or private businesses or organizations. Persons receiving wildlife damage could still resort to lethal methods or other methods not recommended by WS, use contractual services of private businesses that were available to them, or take no action. This alternative would allow for technical assistance and non-lethal wildlife damage management based on the needs of multiple resources (aircraft, human health and safety and the airport environment).

This alternative may not allow the Missouri WS program to fully protect multiple resources on all Missouri airfields. Analysis of Alternative 2 showed low level of impact for the target species, non-target species and T&E species. Alternative 2 was not selected because it would not allow WS to: 1) respond to all requests, 2) monitor the implementation of lethal methods, 3) address all public health and safety requests.

Alternative 3 - Lethal WDM Only By WS

Under this alternative, WS would provide only lethal direct control services and technical assistance. Technical assistance would include making recommendations to MDC and USFWS regarding the issuance of permits to Missouri airports to allow the take of wildlife by lethal methods. Requests for information regarding non-lethal management approaches would be referred to MDC, local animal control agencies, or private businesses or organizations. Individuals might choose to implement WS lethal recommendations, implement non-lethal methods or other methods not recommended by WS, contract for WS lethal direct control services, use contractual services of private businesses, or take no action.

This alternative would allow for only lethal wildlife damage management based on the needs of multiple resources (aircraft, human health and safety and the airport environment) and would be implemented following consultations with the MDC and USFWS. This alternative may not allow the Missouri WS program to protect multiple resources on all Missouri airfields at the request of airfield management. Alternative 3 conforms to the MOUs between WS, and state agencies that recognize WS as the primary agency for the management of wildlife at Missouri airports. Analysis of Alternative 3 showed low level of impact for the target species, non-target species and T&E species.

Alternative 4 - No Federal WS WDM (No Action)

This alternative would eliminate WS involvement in WDM at Missouri airfields. WS would not provide direct operational or technical assistance and requests of WS services would have to conduct their own WDM without WS input.

This alternative would result in no assistance from WS in reducing wildlife damage at the Missouri airfields. WS would not provide technical assistance or operational damage management services. Alternative 4 was not selected because law reaffirmed by a court decision charges WS reducing damage caused by wildlife (U. S. District Court of Utah 1993). This alternative would not allow WS to meet its statutory responsibility for providing assistance or to reduce wildlife damage. In addition, Alternative 4 violates MOUs' between APHIS-WS and state agencies as they recognize that management of wildlife damage at airports in Missouri is important and may involve wildlife damage management to achieve management objectives.

Alternatives Considered but not Analyzed in Detail are the Following:

Technical Assistance Only. The Technical Assistance alternative would direct the Missouri WS program efforts to only provide the Missouri Airport Technical Assistance. This alternative was not considered by Missouri WS in detail because: 1) It would prevent the MO WS office from carrying out several ongoing non-lethal and lethal wildlife damage management projects for Missouri airports. 2) It would prevent WS from providing any specialized direct control activities that other agencies or airport employees are not trained to perform. 3) This would be inconsistent with the MOU between WS and state agencies.

Finding of No Significant Impact

The analysis in the EA indicates that there will not be a significant impact, individually or cumulatively, on the quality of the human environment as a result of this proposed action. I agree with this conclusion and therefore find that an EIS need not be prepared. This determination is based on the following factors:

1. Wildlife management, as conducted by WS in Missouri, is not regional or national in scope.
2. The proposed action would pose minimal risk to public health and safety.
3. There are no unique characteristics such as parks, prime farmlands, wetlands, wild and scenic areas, or ecologically critical areas that would be significantly affected.
4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to wildlife damage management, this action is not highly controversial in terms of size, nature, or effect.
5. Based on the analysis documented in the EA and the accompanying administrative file, the effects of the proposed damage management program on the human environment would not be significant. The effects of the proposed activities are not highly uncertain and do not involve unique or unknown risks.
6. The proposed action would not establish a precedent for any future action with significant effects.

7. No significant cumulative effects were identified through this assessment. The number of wildlife taken by WS, when added to the total known other take of wildlife, falls well within allowable harvest levels.
8. The proposed activities would not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor would they likely cause any loss or destruction of significant scientific, cultural, or historical resources.
9. An informal consultation with the USFWS confirmed that the proposed action would not likely adversely affect any T&E species.
10. The proposed action would be in compliance with all federal, state, and local laws imposed for the protection of the environment.

Decision and Rationale

I have carefully reviewed the EA and the input from the public involvement process. I believe that the issues identified in the EA are best addressed by selecting Alternative 1 Fully Integrated Wildlife Damage Management (WDM) (Proposed Action) and applying the associated mitigation and monitoring measures discussed in Chapter 3 of the EA. Alternative 1 would provide the greatest effectiveness and selectivity of methods available, the best cost-effectiveness, and has the potential to even further reduce the current low level of risk to the public, and non-target and T&E species. WS will continue to use currently authorized wildlife damage management methods in compliance with all the applicable mitigation measures listed in Chapter 3 of the EA. I have also adopted the Pre-Decisional EA "WILDLIFE DAMAGE MANAGEMENT AT AIRPORTS IN MISSOURI" with the Decision as the final.

For additional information regarding this decision, please contact Ed Hartin, APHIS-WS, 1714 COMMERCE COURT, SUITE C, MO 65202, telephone (573) 449-3033.

Rick Owens, Acting Regional Director
APHIS-WS Eastern Region

Date

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